

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CARLETON  
NELSON; CASEY KIRSCHNER;  
ALLCORE DEVELOPMENT LLC;  
FINBRIT HOLDINGS LLC; CHESHIRE  
VENTURES LLC; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

**DECLARATION OF TODD W. SHAW IN SUPPORT OF PLAINTIFFS’  
MOTION TO HOLD DEFENDANTS BRIAN WATSON &  
WDC HOLDINGS LLC IN CIVIL CONTEMPT**

I, Todd W. Shaw hereby declare, under penalty of perjury, as follows:

1. I am over the age of 18 years. I have personal knowledge of the facts set forth below, and if called upon to do so, I could and would competently testify thereto.
2. I am an attorney licensed to practice law in the State of Texas and the District of Columbia. I am an attorney at the law firm of Gibson, Dunn & Crutcher, LLP (“Gibson Dunn”), and counsel for Amazon.com, Inc. and Amazon Data Services, Inc. (collectively “Plaintiffs” or “Amazon”). I make this declaration in support of Plaintiffs’

Motion To Hold Defendants Brian Watson & WDC Holdings LLC In Civil Contempt. If called as a witness, I could and would testify to the same as stated herein.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the hearing on Plaintiffs' Motion for Supplementary Rule 37 Relief, held by this Court on September 10, 2021.

4. Attached hereto as **Exhibit 2** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or around February 3, 2021, was designated as "Confidential" by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914476–WDC0914481.

5. Attached hereto as **Exhibit 3** is a true and correct copy of a letter from Elizabeth Papez at Gibson Dunn, counsel for Amazon, to Donald Marcotte, Manager of 800 Hoyt LLC, and copying Stanley Garnett at Brownstein Hyatt Farber Schreck and George Calhoun at Ifrah Law, both counsel for Defendants WDC Holdings LLC and Brian Watson, dated August 24, 2021.

6. Attached hereto as **Exhibit 4** is a true and correct copy of an email from Stanley Garnett at Brownstein Hyatt to Elizabeth Papez, Claudia Barrett, and Patrick Stokes at Gibson Dunn, dated September 18, 2021, with the subject line "800 Hoyt, proposal."

7. On July 16, 2021, Defendants Brian Watson and WDC Holdings (the "Northstar Defendants") produced to Amazon electronic images of three devices owned by

Watson (the “Watson Devices”) pursuant to the Court’s July 9, 2021 order to “fully and completely produce [the] devices imaged by their third-party vendor.” Dkt. 302.

8. Attached hereto as **Exhibit 5** is a true and correct copy of [REDACTED]

[REDACTED] The document was located in the Watson Devices produced on July 16, 2021, and, per the Court’s July 9, 2021 order, Dkt. 302, is designated “Highly Confidential—Outside Attorneys’ Eyes Only.” Exhibit 5 is Bates numbered WATSON-IMAGE-00000011–13.

9. Attached hereto as **Exhibit 6** is a true and correct copy of [REDACTED]

[REDACTED] The document was located in the Watson Devices produced on July 16, 2021, and, per the Court’s July 9, 2021 order, Dkt. 302, is designated “Highly Confidential—Outside Attorneys’ Eyes Only.” Exhibit 6 is Bates numbered WATSON-IMAGE-00000014–16.

10. Attached hereto as **Exhibit 7** is a true and correct copy of [REDACTED]

[REDACTED] The document was located in the Watson Devices produced on July 16, 2021, and, per the Court’s July 9, 2021 order, Dkt. 302, is designated “Highly Confidential—Outside Attorneys’ Eyes Only.” Exhibit 7 is Bates numbered WATSON-IMAGE-00000017–19.

11. Attached hereto as **Exhibit 8** is a true and correct copy of [REDACTED]

[REDACTED] The document was located in the Watson Devices produced on July 16, 2021, and, per the Court’s July 9, 2021 order, Dkt. 302, is designated “Highly Confidential—Outside Attorneys’ Eyes Only.” Exhibit 8 is Bates numbered WATSON-IMAGE-00000020–23.

12. Exhibits 9–31, described individually below, [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

13. In particular, Exhibits 9–31 show [REDACTED]

[REDACTED]

[REDACTED]

14. On [REDACTED]

[REDACTED]

[REDACTED] Exhibits 9 and 10 to this Declaration.

15. Attached hereto as Exhibit 9 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was

produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914364.

16. Attached hereto as **Exhibit 10** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

17. [REDACTED]

[REDACTED]

[REDACTED] on **Exhibits 11 and 12** to this Declaration.

18. Attached hereto as **Exhibit 11** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0599912–WDC0599919.

19. Attached hereto as **Exhibit 12** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

The document was produced to Amazon in native format by Defendants Brian Watson and

WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

20. [REDACTED]

[REDACTED] on **Exhibits 13 and 14** to this Declaration.

21. Attached hereto as **Exhibit 13** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0599912–WDC0599919.

22. Attached hereto as **Exhibit 14** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

23. [REDACTED]

[REDACTED] **Exhibit 15 and 16** to this Declaration.

24. Attached hereto as **Exhibit 15** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914353.

25. Attached hereto as **Exhibit 16** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

26. [REDACTED]

[REDACTED]

[REDACTED] on **Exhibits 17 and 18** to this Declaration.

27. Attached hereto as **Exhibit 17** is a true and correct copy of a [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC

on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC506748.

28. Attached hereto as **Exhibit 18** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

29. [REDACTED]

[REDACTED] on **Exhibits 19 and 20** to this Declaration.

30. Attached hereto as **Exhibit 19** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914375.

31. Attached hereto as **Exhibit 20** is a true and correct copy of [REDACTED]



[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

32. [REDACTED]

[REDACTED] **Exhibits 21 and 22** to this Declaration.

33. Attached hereto as **Exhibit 21** is a true and correct copy of [REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914417.

34. Attached hereto as **Exhibit 22** is a true and correct copy of [REDACTED]

[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2021, was marked “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

35. [REDACTED]

[REDACTED] **Exhibits 23**

**and 24** to this Declaration.

36. Attached hereto as **Exhibit 23** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914293.

37. Attached hereto as **Exhibit 24** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was marked “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

38. [REDACTED]

[REDACTED] on **Exhibits 25 to 27** to this Declaration.

39. Attached hereto as **Exhibit 25** is a true and correct copy of [REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914314.

40. Attached hereto as **Exhibit 26** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

41. Attached hereto as **Exhibit 27** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

42. [REDACTED]

**Exhibits 28 and 29** to this Declaration.

43. Attached hereto as **Exhibit 28** is a true and correct copy of [REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914476.

44. Attached hereto as **Exhibit 29** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

45. [REDACTED]

[REDACTED]

**Exhibits 30 and 31** to this Declaration.

46. Attached hereto as **Exhibit 30** is a true and correct copy of a [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914517.

47. Attached hereto as **Exhibit 31** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED] The

document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0715068.

48. WDC Holdings’ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

49. Exhibits 32 to 48, described individually below, show [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

50. In particular, Exhibits 32–48 show [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

51. On [REDACTED]

[REDACTED] **Exhibit 32**

and **Exhibit 33** to this Declaration.

52. Attached hereto as **Exhibit 32** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0529719–0529726.

53. Attached hereto as **Exhibit 33** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

54. On [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] in **Exhibit 34–37** to this Declaration.

55. Attached hereto as **Exhibit 34** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0506748–0506754.

56. Attached hereto as **Exhibit 35** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

57. Attached hereto as **Exhibit 36** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or about December 11, 2020, and was marked “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

58. Attached hereto as **Exhibit 37** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on December 11, 2020 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

59. [REDACTED]

[REDACTED]

[REDACTED] **Exhibit 38** and **Exhibit 39** to this Declaration.

60. Attached hereto as **Exhibit 38** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914386–0914392.



61. Attached hereto as **Exhibit 39** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on December 11, 2020 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

62. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] **Exhibit 40** and **Exhibit 41** to this Declaration.

63. Attached hereto as **Exhibit 40** is a true and correct copy of an [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914417–0914423.

64. Attached hereto as **Exhibit 41** is a true and correct copy of [REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

65. Attached hereto as **Exhibit 42** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on December 11, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0513994.

66. [REDACTED]

[REDACTED] **Exhibit 43** and **Exhibit 44** to this Declaration.

67. Attached hereto as **Exhibit 43** is a true and correct copy of [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914476–0914481.

68. Attached hereto as **Exhibit 44** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on August 28, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0001942.

69. [REDACTED]

[REDACTED]

[REDACTED] in **Exhibit 45** and **Exhibit 46** to this Declaration.

70. Attached hereto as **Exhibit 45** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on February 3, 2021 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914486–0914491.

71. Attached hereto as **Exhibit 46** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on August 28, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0001942.

72. [REDACTED]

[REDACTED]

[REDACTED] **Exhibit 47** and **Exhibit 48** to this Declaration.

73. Attached hereto as **Exhibit 47** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on February 3, 2011 was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0914506–0914511.

74. Attached hereto as **Exhibit 48** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on August 28, 2020, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0001942.

75. [REDACTED]

[REDACTED] For example, [REDACTED]

[REDACTED] in **Exhibit 49** and **Exhibit 50** to this Declaration.

76. Attached hereto as **Exhibit 49** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on December 11, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0749431–0749436.

77. Attached hereto as **Exhibit 50** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon in native format by Defendants Brian Watson and WDC Holdings LLC on February 3, 2021, was designated “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0911899.

78. Attached hereto as **Exhibit 51** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED] The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or around September 14, 2021, was designated as “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0956741–0956780.

79. Attached hereto as **Exhibit 52** is a true and correct copy of the Defendants’ Fourth Supplemental Answers To Plaintiffs’ First Set Of Interrogatories, dated September 8, 2021, and verified by Defendant Brian Watson on behalf of himself and Defendant WDC Holdings LLC.

80. Attached hereto as **Exhibit 53** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED] The document was located in the Watson Devices produced on July 16, 2021, and, per the Court’s July 9, 2021 order, Dkt. 302, is designated “Highly Confidential—Outside Attorneys’ Eyes Only.” Exhibit 53 is Bates numbered WATSON-IMAGE-00000024.


81. Attached hereto as **Exhibit 54** is a true and correct copy of [REDACTED]

[REDACTED]

██████████ The document was produced to Amazon by Defendants Brian Watson and WDC Holdings LLC on or around December 24, 2020, was designated as “Confidential” by them pursuant to the Protective Order in this case, and is Bates numbered WDC0904214–0904215.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on September 30, 2021.

  
\_\_\_\_\_  
Todd W. Shaw